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Counsel to Eagle Eye Advance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:)	
)	Chapter 11
)	
EMPIRE COUNTERTOPS, LLC,)	Case No. 22-41686-BTR
)	
Debtor.)	
)	

EAGLE EYE ADVANCE LLC’S LIST OF WITNESSES AND EXHIBITS

Eagle Eye Advance LLC (“Eagle Eye”), by counsel, submits the following as its List of Witnesses and Exhibits to be relied upon at the hearing on *Debtor’s Motion for Entry of Interim and Final Orders Authorizing Debtor’s Use of Cash Collateral Pursuant to Bankruptcy Code Section 361, 362 and 363* [Docket No. 13] (the “Cash Collateral Motion”) filed by Empire Countertops, LLC (the “Debtor”):

WITNESSES

Eagle Eye hereby identifies the following individuals which may be called in connection with the hearing on the Debtor’s Cash Collateral Motion:

1. Elliot Shasho;
2. Erica R. Gilerman; and

3. Any other witness listed on the Debtor's or any other party in interest's lists of witnesses.

EXHIBITS

Eagle Eye hereby identifies the following exhibits, which are attached hereto, that Eagle Eye may seek to introduce as evidence in connection with the hearing on the Debtor's Cash Collateral Motion:

<u>Exhibit</u>	<u>Document</u>
A	Standard Merchant Cash Advance Agreement Dated March 24, 2022
B	UCC Financing Statement filed with the Texas Secretary of State as Filing Number 22-0021555244
C	Chase Bank Statements

In addition to the above-referenced exhibits, the Trustee may use any other exhibit listed or designated by any other party in connection with these proceedings.

Richmond, Virginia
Dated: December 14, 2022

/s/ Brian J. Wagner
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and

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CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I hereby certify under penalty of perjury that on December 14, 2022, a true and correct copy of the foregoing document was served on all necessary parties via the Court's CM/ECF.

/s/ Brian J. Wagner
Counsel